

EXHIBIT 5

1
2
3 IN THE UNITED STATES DISTRICT COURT

4 FOR THE DISTRICT OF PUERTO RICO

5 _____x
In re:

6 THE FINANCIAL OVERSIGHT AND
7 MANAGEMENT BOARD FOR PUERTO
8 RICO,

PROMESA

Title III

as representative of

Case No.

9 THE COMMONWEALTH OF PUERTO RICO,
et al.,
Debtors.

17-BK-3283 (LTS)

10 _____x
In re:

11 THE FINANCIAL OVERSIGHT AND
12 MANAGEMENT BOARD OF PUERTO RICO,
13 as representative of
14 PUERTO RICO ELECTRIC POWER AUTHORITY,
Debtor.

PROMESA

Title III

17-BK-4780 (LTS)

15 _____x
(Caption continued on following page.)

16 * P R O F E S S I O N A L E Y E S O N L Y *

17 DEPOSITION

18 OF

19 CHRISTIAN SOBRINO VEGA

20 Tuesday, October 22, 2019

21 San Juan, Puerto Rico

22
23
24 Reported by:

ANNETTE ARLEQUIN, CCR, RPR, CRR, CLR

25 JOB NO. 170380

1 C. Sobrino - Professional Eyes Only

2 BY MR. WORTHINGTON:

3 Q. Do you know if a collection was
4 made of your texts and chats while you were
5 at AAFAF relating to the PREPA RSA?

6 A. I don't know.

7 Q. So while you were employed at
8 AAFAF, you're not aware of whether any
9 collection was made of your texts and chat
10 messages relating to the PREPA RSA; is that
11 right?

12 A. No.

13 Q. We've seen at least one
14 example -- we've seen a number of examples
15 of emails that you were a party to, and
16 we've seen at least one example of a chat
17 that you were a party to.

18 How did you choose -- let's take
19 Ms. Jaresko.

20 When you communicated with
21 Ms. Jaresko, is it correct that sometimes
22 you communicated with her by email? That's
23 right?

24 A. Yes.

25 Q. And sometimes you communicated

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2 opposed to email?

3 A. I don't know.

4 Q. Do you know if your hard copy
5 documents were collected while you were at
6 AAFAF, excuse me, your hard copy documents
7 relating to the PREPA RSA were collected
8 while you were at AAFAF?

9 Did anyone come and ask you for
10 any notes, any handwritten notes that you
11 might have kept?

12 A. I didn't keep notes, generally.
13 My files and reference materials were in my
14 office, and if they needed to be collected,
15 somebody would ask my assistant and I
16 didn't really -- I wasn't really involved
17 in document production.

18 Q. Does AAFAF -- did either AAFAF or
19 PREPA have any policies you're aware of
20 regarding the use of non-official emails as
21 a medium to communicate concerning AAFAF
22 and PREPA business?

23 A. Can you repeat that?

24 Q. Did either AAFAF or PREPA have
25 any policies that you're aware of regarding

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2 with her by chat; is that right?

3 A. Yes.

4 Q. Sometimes you communicated with
5 her by text; is that right?

6 A. Yes.

7 Q. How did you decide what medium of
8 communication that you would use with
9 Ms. Jaresko at any point in time?

10 A. I don't know. It would depend on
11 the moment.

12 Q. Okay. Like would it depend on
13 the topic of conversation? Were some
14 subjects of communication you would handle
15 them by email and other topics of
16 communication, you would handle them by
17 chat? Was it random? Is there a pattern
18 to your selection of means of
19 communication?

20 A. There wasn't a protocol on how we
21 communicated.

22 Q. Okay. Are there any topics
23 you're aware of related to the PREPA RSA
24 that you only you and Ms. Jaresko
25 communicated by visa text or chat as

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2 the use of non-official email means of
3 communication to communicate concerning
4 AAFAF or PREPA business?

5 A. I don't remember.

6 MR. SAGARDIA-ABREU: One second.
7 I have to...

8 MR. WORTHINGTON: Sure. Let's go
9 off the record.

10 (Witness and counsel conferring.)

11 BY MR. WORTHINGTON:

12 Q. Do you maintain -- strike that.

13 While you were at AAFAF, did you
14 maintain both personal and work cell
15 phones?

16 Did you have two or one cellphone
17 while you worked at AAFAF?

18 A. I owned one cellphone.

19 Q. Okay.

20 (Sobrino Exhibit 12, Chat
21 transcript, Bates-stamped
22 PREPA_RSA0034658 through 34663, marked
23 for identification, as of this date.)

24 BY MR. WORTHINGTON:

25 Q. So I've handed you a chat marked

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2 PREPA RSA. The first Bates number is
3 34658.

4 A. Um-hmm.

5 Q. And do you recall these chat
6 exchanges or text exchanges?
7 (Document review.)

8 MR. NATBONY: Objection as to
9 form.

10 BY MR. WORTHINGTON:

11 Q. So this is a set of chats that
12 were produced to us. They include English
13 and Spanish. So we had a translation
14 prepared. So the first half of the exhibit
15 is the Spanish original -- Spanish and
16 English original as it was produced to us.
17 And then the second half of the document is
18 a certified translation which translates
19 the Spanish components of the chat and
20 integrates it into a single document.

21 A. Okay.

22 Q. So do you recall the chat
23 exchanges that occurred that are in this
24 document?

25 MR. NATBONY: Same objection.

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2 without this."

3 Do you see that? That's on the
4 last page.

5 A. Um-hmm.

6 Q. Do you recall when you sent that
7 message? The issue is these were produced
8 to us without dates, and we're trying to
9 get an understanding of when these chats
10 occurred.

11 A. I don't remember when.

12 Q. Okay.

13 MR. TEELE: Is there --

14 MR. WORTHINGTON: Go ahead.

15 MR. TEELE: Never mind. I'm
16 sorry.

17 BY MR. WORTHINGTON:

18 Q. If you look at the first document
19 here --

20 A. The first page?

21 Q. The first page.

22 (Document review.)

23 Q. And in English, the translation
24 reads, for a message you send, at the
25 bottom of the first page: "Fernando, where

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2 A. Each one specifically?

3 Q. Do you recall the time frame over
4 which -- there seems to be a number of
5 communications back and forth that are
6 embedded in this document.

7 Do you recall when the first
8 exchange was and when the last exchange
9 was?

10 What is the time frame that you
11 recall over which the chats in this
12 document occurred?

13 MR. TEELE: Object to the form.

14 I'm going to object to the form for
15 now.

16 (Document review.)

17 A. I recognize some of the messages,
18 yes.

19 Q. Okay. So the last -- let's go to
20 the last message.

21 "Guys, don't want to be a dick,
22 but I need the demand protection stuff now,
23 like final with all the numbers that I
24 asked for. It's getting really difficult
25 for me to get final signup on things

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2 are we with the PREPA RSA? I'm back. I'm
3 resting. I have a win under my belt. I am
4 hungry for more wins. Where is my RSA?"

5 Do you recall when you sent that
6 message, approximately?

7 Do you know what the win you were
8 referring to as having under your belt was?

9 A. No. I could be really cocky
10 sometimes.

11 MR. FRIEDMAN: No objection.

12 (Laughter.)

13 BY MR. WORTHINGTON:

14 Q. The end of this first exchange of
15 chats at 8:05, if you can turn to page 2,
16 you sent a chat saying, "The beast is
17 hungry."

18 A. Um-hmm.

19 Q. What were you referring to?

20 A. I have no idea.

21 Q. Do you know Elias Sanchez?

22 MR. SAGARDIA-ABREU: Objection.

23 MR. WORTHINGTON: You want to
24 talk off the record?

25 MR. TEELE: Can we take a second

1 C. Sobrino - Professional Eyes Only
2 break?

3 MR. WORTHINGTON: Sure. That is
4 fine.

5 (Witness and counsel conferring.)

6 A. Okay.

7 Q. So the question is: Do you know
8 Elias Sanchez?

9 A. Yes.

10 Q. Since starting your role at
11 AAFAF, have you met with Mr. Sanchez?

12 A. So given the fact that the
13 Justice Department in Puerto Rico is
14 conducting an investigation that involves a
15 number of people, including myself, and
16 there is public knowledge that the Justice
17 Department has requested information from
18 Elias Sanchez, I am exercising my Fifth
19 Amendment right.

20 Q. Okay. Since starting your role
21 at AAFAF, have you had any conversations
22 with Mr. Sanchez about either the
23 preliminary or the definitive RSA?

24 A. Again, I'm exercising my Fifth
25 Amendment right regarding any matter with

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2 they have requested an extension to
3 finalize the preliminary investigation
4 until January 10th. The office of the
5 special independent prosecutor has
6 approved that extension. So in view of
7 the pendency of that investigation,
8 Mr. Sobrino will not answer any
9 questions related to that subject
10 matter.

11 I understand that he must
12 exercise his rights as to a particular
13 question, but in terms of time and
14 research, I think it's the best move to
15 move to another subject because he's
16 not going to answer any of that.

17 BY MR. WORTHINGTON:

18 Q. Okay. So let me ask a final
19 question then.

20 If I were to ask you any question
21 about your work at AAFAF and any meetings
22 or communications that you may have had
23 with Mr. Sanchez or any clients of
24 Mr. Sanchez or any associates of
25 Mr. Sanchez, would you exercise your Fifth

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2 Elias Sanchez.

3 Q. Okay. Have you had -- since
4 starting your role at AAFAF, have you had
5 any conversations with Mr. Sanchez about
6 the PREPA T&D transformation process?

7 A. I'm exercising Fifth Amendment
8 rights regarding anything regarding Elias
9 Sanchez.

10 Q. Since starting your role at
11 AAFAF, have you had any conversations with
12 anyone you knew to be a client of
13 Mr. Sanchez regarding the preliminary or
14 definitive RSA?

15 A. Regarding any matter that
16 involves Elias Sanchez, I am exercising --

17 MR. SAGARDIA-ABREU: I'm sorry, I
18 think Mr. Sobrino has been crystal
19 clear as to the fact that he's not
20 going to answer any question relating
21 to Mr. Sanchez or any aspect of any
22 communications that could be a subject
23 of the criminal probe that is conducted
24 by the Justice Department. Today, the
25 Justice Department has informed that

1 C. Sobrino - Professional Eyes Only
2 Amendment right?

3 A. I will exercise my Fifth
4 Amendment right regarding any question that
5 involves Elias Sanchez.

6 Q. Okay. Do you know Manny Ortiz?

7 A. Yes.

8 Q. Have you had any meetings or
9 communications with Mr. Ortiz since you
10 started your role at AAFAF?

11 A. I met with Manny Ortiz. I said
12 yes.

13 Q. Okay. Have you met with
14 Mr. Ortiz on numerous occasions since you
15 started your role at AAFAF?

16 A. I don't have a role in AAFAF.

17 Q. Sorry. Since you started your
18 role at AAFAF, since that time going
19 forward --

20 MR. SAGARDIA-ABREU: During the
21 period he worked --

22 BY MR. WORTHINGTON:

23 Q. During the period you worked at
24 AAFAF, did you have any meetings or
25 communications with Mr. Ortiz?

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2 A. Yes.
3 Q. Approximately, how many?
4 A. I don't know.
5 Q. More than a few?
6 A. I guess.
7 Q. Did any of those conversations
8 with Mr. Ortiz relate to the negotiation of
9 either the preliminary RSA or the
10 definitive RSA?
11 A. Regarding the RSA, my discussions
12 with Manuel Ortiz were framed by the
13 discussions of the PREPA RSA that were
14 being conducted in Congress and his
15 feedback on what he was receiving from
16 them.
17 Q. Sorry. By that, you're referring
18 to the congressional reaction, letters from
19 Congress that were received after the
20 definitive RSA was announced?
21 A. Yes.
22 Q. Okay. Have you had any
23 discussions with Mr. Ortiz concerning the
24 PREPA T&D transformation process?
25 A. Not that I recall.

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2 Q. What are you doing professionally
3 today? Strike that.
4 Since you left AAFAF, what have
5 you been doing professionally?
6 MR. TEELE: Objection to form.
7 BY MR. WORTHINGTON:
8 Q. Have you been employed?
9 MR. TEELE: You can answer.
10 A. I've been providing corporate
11 legal and administrative services to one
12 client.
13 Q. Who is that client?
14 A. I can't -- the professional
15 service agreement I have is -- does not
16 allow me to give the name of the client,
17 but it's a -- I can say that it's a company
18 that is involved in the healthcare sector
19 in Florida and southern United States and
20 had no relationship with the government of
21 Puerto Rico, directly or indirectly, other
22 than requesting an Act 20 decree.
23 Q. And is it a company that has had
24 any involvement in issues relating to PREPA
25 in any way?

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2 A. Other than in paying the light
3 bill, no.
4 Q. And so actually at the very
5 beginning of the day, I asked if your
6 LinkedIn profile covered all of your
7 significant professional experience. And
8 your answer was it covered all of your
9 salaried experience.
10 Is there other -- with -- this
11 employment now, is it being done -- is it
12 being done on a salary basis?
13 A. I said it's a professional
14 services.
15 Q. Professional services, okay.
16 So you're being paid consulting
17 fees?
18 A. Essentially.
19 Q. And is that -- when you made the
20 distinction between salaried employment and
21 other employment, was this the distinction
22 that you had in mind?
23 A. I didn't have one in mind. I
24 think I said it was significant because
25 this has only been in place for about a

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2 month or two.
3 Q. Got it. Okay.
4 Is there other professional work
5 that you've done where your compensation
6 has been other than through a salary which
7 is not reflected in your LinkedIn profile?
8 A. Right now?
9 MR. TEELE: I'm going to object
10 to the form of the question, but you
11 can answer.
12 BY MR. WORTHINGTON:
13 Q. Yeah, let's say -- actually, I
14 can give you -- let's do it -- since the
15 beginning of 2017, have you done any
16 professional work for compensation other
17 than a salary that's not reflected in your
18 LinkedIn profile?
19 A. No.
20 Q. Okay. When I asked you
21 earlier --
22 THE WITNESS: Sorry, excuse me.
23 MR. WORTHINGTON: Why don't we go
24 off record and take a quick break. I
25 may be done.

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2 MR. TEELE: Before going off the
3 record, the question was about it just
4 being professional services.

5 MR. WORTHINGTON: Okay. Let's
6 take a five-minute break.

7 (Recess is taken.)

8 MR. TEELE: Just clear it up.

9 THE WITNESS: Just to be clear,
10 from 2017 up to when I left the
11 Government of Puerto Rico, I was paid
12 -- my compensation was paid through the
13 Government Development Bank.

14 In 2017, I received a liquidation
15 payment of my benefits in 2016 from my
16 previous employer, which was AbbVie,
17 which is here.

18 Since 2019, I've been consulting
19 for one engagement on a professional
20 services basis, which is the one that I
21 described earlier.

22 BY MR. WORTHINGTON:

23 Q. Okay. Thank you. That clears
24 things up.

25 I have just a couple of other

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2 what I am trying to get at.

3 A. I didn't have a device -- a
4 cellphone that was owned by AAFAF?

5 Q. Yes.

6 A. There was a portable WiFi that
7 provided --

8 Q. Like a hot spot?

9 A. Yes.

10 Q. That's fine. But you didn't --

11 A. That was owned by AAFAF.

12 Q. But you didn't send text with it
13 and text --

14 A. On the WiFi?

15 Q. -- on the WiFi hot spots --

16 MR. SAGARDIA-ABREU: There are no
17 official cellphones --

18 A. No.

19 Q. Got it.

20 MR. SAGARDIA-ABREU: I was just
21 clarifying the governor of Puerto Rico
22 doesn't have official cell phones a
23 couple of years ago.

24 MR. WORTHINGTON: Got it. Good
25 to know.

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2 final questions.

3 You testified earlier -- I asked
4 if, during the time in which you worked at
5 AAFAF, if you had more than one cellphone
6 and your answer was that you owned one
7 cellphone. So I should have asked a more
8 precise question.

9 Did you use more than one
10 cellphone during the period in which you
11 worked for AAFAF?

12 A. No. I had one cellphone. I
13 exchanged it for newer versions.

14 Q. At any given point in time, did
15 you ever regularly use more than one
16 cellphone while you worked at AAFAF at the
17 same time?

18 MR. SAGARDIA-ABREU: When you say
19 cellphone, you mean cellphone number
20 or --

21 BY MR. WORTHINGTON:

22 Q. No, I mean a physical device.

23 Like did you have a work device
24 that was owned by AAFAF and a personal
25 device that you owned yourself? That is

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2 BY MR. WORTHINGTON:

3 Q. To your knowledge, does Manny
4 Ortiz or his firm represent any
5 bondholders, insurers, or PREPA T&D
6 concessionaires?

7 MR. NATBONY: Objection as to
8 form.

9 A. To my knowledge, no.

10 Q. At the time after the preliminary
11 RSA was entered into, did you have an
12 understanding as to whether or not it was
13 binding?

14 MR. TEELE: Objection. Calls for
15 a legal conclusion.

16 You can still answer if you know.

17 MR. NATBONY: Objection to form.

18 A. What do you mean?

19 Q. I'll ask a different question.

20 Did you have an understanding
21 that there would be economic consequences
22 for PREPA, AAFAF if they were to choose not
23 to proceed with the definitive RSA arising
24 from -- strike that.

25 Did you have an understanding

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2 that there would be economic consequences
3 for PREPA and AAFAF, penalties for
4 breaching or terminating the preliminary
5 RSA if they chose not to the proceed with a
6 definitive RSA?

7 MR. NATBONY: Objection as to
8 form and calls for a legal conclusion.

9 MR. TEELE: I also want to state
10 the objection that if you can answer
11 without divulging any attorney-client
12 privileged communications, you can
13 answer, but otherwise...

14 BY MR. WORTHINGTON:

15 Q. Well, as the chairman of AAFAF at
16 the time, did you have an understanding
17 that there would be negative consequences
18 to -- arising from the preliminary RSA if
19 AAFAF did not choose to proceed with the
20 definitive RSA?

21 MR. TEELE: Same objection.

22 MR. NATBONY: Same objection as
23 to a legal conclusion.

24 BY MR. WORTHINGTON:

25 Q. You can answer.

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2 Rico-based consultants or advisors
3 represent Duke Energy?

4 MR. TEELE: Objection as to form.

5 A. It's either -- I think it's DLA
6 Piper or McConnell Valdés, one of those
7 two.

8 Q. How about PSE&G?

9 A. PSE&G, I don't know if they have
10 any in Puerto Rico.

11 Q. How about Exelon, E-x-e-l-o-n?

12 A. I don't recall.

13 Q. How about Quanta, ATCO and IEM?

14 MR. TEELE: Objection to form.

15 BY MR. WORTHINGTON:

16 Q. Are you aware there is a
17 consortium of Quanta, ATCO and IEM?

18 A. I don't recall.

19 Q. Do you know if Mr. Elias Sanchez
20 or anyone affiliated with Mr. Sanchez acts
21 as a consultant or an adviser to any of the
22 participants in the P3 transformation
23 process?

24 A. As I stated before, any question
25 regarding Elias Sanchez, I exercise my

1 C. Sobrino - Professional Eyes Only
2 A. The legal -- the -- any causes of
3 action that could have arisen from not
4 proceeding with the preliminary RSA, I can
5 -- I can't say that I recall if that was a
6 primary consideration. The primary
7 concern, both from the Oversight Board as
8 it was expressed to me and myself for not
9 including the preliminary RSA, was a Title
10 III process that could have impeded or made
11 more difficult the transformation process
12 and/or that could have ended with adverse
13 decisions against the debtor. That was the
14 main concern.

15 Q. Okay. So remedies arising from
16 the preliminary RSA itself were not the
17 main concern of AAFAF and PREPA as they
18 considered the definitive RSA?

19 A. That I recall at this moment, no.
20 The main concern that I recall was the --
21 from not following through with the
22 preliminary RSA was concerns with the
23 transformation process and with an adverse
24 result in the PREPA Title III.

25 Q. Do you know what Puerto

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2 Fifth Amendment rights.

3 MR. WORTHINGTON: Okay. I have
4 no further questions at this time. I
5 reserve in case there are follow-up
6 questions following after -- if there
7 are follow-up questions at the end, I
8 reserve the right to make final
9 questions.

10 MR. LYNCH: Let's go off the
11 record very briefly.

12 EXAMINATION BY

13 MR. LYNCH:

14 Q. Good afternoon, Mr. Sobrino.

15 A. Hello.

16 Q. I'm John Lynch. I'm at Wachtell
17 Lipton Rosen & Katz. We represent Cortland
18 Capital Market Services LLC.

19 Just a couple of questions about
20 your background and following up on some of
21 the testimony this morning.

22 The LinkedIn page that you were
23 shown this morning as Sobrino Exhibit 1, it
24 says that you were at the Government
25 Development Bank for Puerto Rico from

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<p>1 C. Sobrino - Professional Eyes Only 2 January 2017 to July 2019. Feel free to 3 have a look at it. 4 Is that correct? 5 (Document review.) 6 Q. Page 3 of 8. 7 A. I was -- the board of directors 8 of GDB named me president in January of 9 2017, and I resigned in July of '19. 10 Q. So you were at both the GDB and 11 AAFAF at the same time; is that right? 12 A. When I was named executive 13 director of AAFAF, yes. 14 Q. And did you do work for both at 15 the same time? I believe you testified 16 that your paychecks came from the GDB while 17 you were at AAFAF. 18 Do I have that right? 19 A. Yes. 20 Q. Okay. Did you also get paychecks 21 from AAFAF? 22 A. No. You can only receive 23 compensation from one government entity. 24 Q. Okay. Was any part of your 25 day-to-day responsibility, after you became</p>	<p>1 C. Sobrino - Professional Eyes Only 2 between GDB and PREPA. That was handled 3 mostly through O'Melveny. 4 Q. Did you do any work in relation 5 to -- 6 A. In relation to that one, no. 7 Q. If I understand it, and I'm just 8 trying to get the lay of the land here, you 9 were -- when you went on to the PREPA 10 governing board, that was, in essence, a 11 role that you assumed because you were 12 involved with the GDB; is that correct? 13 A. It was assumed in light of the 14 transformation transactions that the 15 governor had announced in -- was it January 16 of 2018? -- when he announced that he 17 wanted to carry out a privatization and 18 concession of PREPA. 19 Q. I'm sorry, what was announced? 20 Can you explain what you mean by that? 21 A. In around January of 2018, after 22 the hurricane, the governor made an 23 announcement saying that his administration 24 was going to enter into a long-term 25 concession for the T&D functions of PREPA</p>
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<p>1 C. Sobrino - Professional Eyes Only 2 the CEO of AAFAF, work that you would 3 describe as relating to GDB but not -- to 4 the GDB but not AAFAF? 5 A. By the time I became executive 6 director of AAFAF, my work with the GDB was 7 mostly concentrated in finalizing the Title 8 VI restructuring or overseeing that 9 process, but operations of the entity 10 itself had more or less ceased, other than 11 financial. 12 Q. And before you became executive 13 director of AAFAF and you were still at the 14 GDB, did any of your work for the GDB 15 relate to PREPA? 16 A. There was -- my delegation of the 17 AAFAF chair in the PREPA governing board 18 was done by Jerry Portela, who is the 19 executive director of AAFAF, to me as 20 president of GDB, because that delegation 21 was authorized under the AAFAF enabling 22 law, mentioned specifically GDB. 23 The GDB had -- if I remember 24 correctly, the GDB had -- there was a loan 25 and deposit arrangement that still remained</p>	<p>1 C. Sobrino - Professional Eyes Only 2 and seek to sell the generation fleet as 3 well as carry out an energy policy reform, 4 and he asked me to oversee that process. 5 So my -- I went into the PREPA governing 6 board in response to that. 7 Q. Thank you. 8 O'Melveny & Myers is counsel for 9 PREPA and AAFAF; is that right? 10 A. My understanding is so, yes. 11 Q. Was there anyone at AAFAF who had 12 responsibility for reviewing papers that 13 owe O'Melveny & Meyers submitted to court 14 in the PREPA Title III case? 15 A. They would typically include from 16 the AAFAF legal department, PREPA legal. 17 There were people, other people that 18 reviewed it. 19 Q. Were you involved in -- let me 20 just step back just to be sure I have that 21 right. 22 So your testimony is that there 23 were people in both the PREPA legal 24 department and the AAFAF legal 25 department --</p>